

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MEGA FUNDING CORP.,

Plaintiff,

v.

PEA CAB CORP., and PERSEFONE  
MANDELOS, a/k/a PERSEFONE C.  
MANDELOS,

Defendants.

Civ. Action No. 19-04734(DLI)

**NOTICE OF MOTION TO REMAND**

**ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE**, that upon the Affirmation of Deborah B. Koplovitz, dated September 13, 2019, and upon the Memorandum of Law, Mega Funding Corp., by its attorneys, Anderson Kill P.C., shall move before the Honorable Dora L. Irizarry, Chief Judge for the Eastern District of New York, in her Courtroom, located at the United States District Court for Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the Court, for an Order:

- (i) Remanding Plaintiff's Motion for Summary Judgment in Lieu of Complaint back to the Supreme Court for the State of New York, County of Queens pursuant to 28 U.S.C. §§1334(c), 1452(b); and
- (ii) providing such other and further relief as necessary.

**PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO LOCAL RULE 6.1(b) IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON THE MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE, WRITTEN OPPOSITION TO THE MOTION NO LATER THAN FOURTEEN (14) DAYS AFTER SERVICE OF THE MOTION**

PAPERS. IN THE EVENT NO WRITTEN OPPOSITION IS SERVED AND FILED,  
PLAINTIFF RESERVES ITS RIGHTS TO REQUEST THAT THE COURT CONSIDER THIS  
MOTION AS UNOPPOSED.

Dated: New York, New York  
September 13, 2019

ANDERSON KILL P.C.

By: /s/ Deborah B. Koplovitz  
Deborah B. Koplovitz  
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Attorneys for Mega Funding Corp

**SERVICE LIST**

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